UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

DATE: APR 14 2017

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Mid-America Steel Drum Company, Inc.

FROM: Manojkumar P. Patel, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Chief
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Mid-America Steel Drum Company, Inc.

Facility Location: 3950 S. Pennsylvania Avenue, St. Francis, Wisconsin 53235

Date of Inspection: 11/20/2016

Lead Inspector: Manojkumar P. Patel, Environmental Engineer

Other Attendees:

1. Mark Furgason, Site Manager, Mid-America Steel Drum Company, Inc.
2. Amy J. Litscher, President, Saga Environmental & Engineering, Inc. – consultant for Mid-America Steel Drum Company, Inc.
3. Mike Griffin, Air Management Engineer, Wisconsin Department of Natural Resources

Purpose of Inspection: To evaluate compliance with applicable requirements of Wisconsin State Implementation Plan (SIP) and the Clean Air Act

Facility Type: NAICS Code 332439 Metal drum reconditiong operations

Arrival Time: 10:20 AM CST
Departure Time: 3:30 PM CST

Inspection Type:

☒ Unannounced Inspection

☐ Announced Inspection

OPENING CONFERENCE

☒ Credentials Presented

☒ CBI warning to facility provided

The following information was obtained verbally from attendees unless otherwise noted.

Company Ownership: Mid-America Steel Drum, Inc. was recently bought out by the Container Life Cycle Management LLC (CLCM), a foreign limited liability company doing business in Wisconsin. This facility is operating under Mid-America Steel Drum. In or around 2010, Grief, Inc. entered into a business of reconditioning of plastic containers and 55-gallons metal drums. Grief is a major owner in CLCM.

Process Description:
Mid-America Steel Drum Company, Inc. (the facility) is located at 3950 South Pennsylvania Avenue, St. Francis, Wisconsin. In or around 2014, the facility's operation across the street at 2529 E. Norwich Avenue, St. Francis shut down and relocated to the Pennsylvania Avenue facility. The surrounding area is commercial to the north and residential to the south.

The facility receives steel and plastic drums via trucks. Plastic drum labels are manually removed from its exterior using a brush-on stripping compound. Emissions from this process are indoor fugitive emissions. Plastic drums are then sent for the cleaning process.

Plastic drums are washed upside down. Plastic and metal drums contain some residuals of solvent, oil, water soluble paints, and some other organic materials. In the exterior caustic drum wash operation, the wash solution is sprayed from the top of the system to the drum exterior. The plastic drums get cleaned and they move to the interior cleaning. The interior drum wash system contains several dip tank stations to clean the interior surface with the hot water in the flush/rinse/clean cycles. The facility has four natural gas fired water heaters that supplies the hot water to the drum washing operation. The hot water is collected into the dip tanks and recirculated in the closed loop system. The uncontrolled emissions from the natural gas-fired heaters, exterior wash system, and interior cleaning system are vented to the stack via wet scrubber.

Steel drums are cleaned in the exterior wash system and rinse system. Residuals are collected in the wash solutions and collected in the dip tanks. Oil is separated from the wash solution. All dip tanks are 2,000 gallon tanks. An internal double split washer cleans the interior surface of steel drums. Steel drums are then forwarded to shot blasting where the exterior surface is shot blasted to accommodate the reconditioning of containers. The particulate matter emissions are collected in the dust collector and shots are reused and mixed with the new shots.

The paint booth coats the exterior of the steel drums. The steel drums are then moved to the natural gas fired oven where 355 ^{0}F is maintained in a Zone 1 and 310 ^{0}F is maintained in Zone 2 for proper curing of the coating. The facility uses a limited number of exterior coatings (8 colors) on steel drums. Emissions from the natural gas fired oven are vented uncontrolled into the atmosphere. The steel drums are stored in the warehouse area for shipping to the customers.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:
We observed the exterior coating line in operation and eight pumps were in use. I observed a pressure differential of 0.15 (ΔP =0.15) inch of water column. I also observed the pressure reading monitoring device's range from -0.05 to 3 inch of water column. The temperature readout at the oven where exterior surface of steel drums are passed through the tunnel was reading Zone 1 at 354 ^{0}F and Zone 2 was reading at 308 ^{0}F.

We requested to observe the roof to see wet scrubber stack and whether there were any dust deposits. We observed a rusting type dust deposited around the scrubber stack area. The scrubber water circulation pump was also seen leaking. Maintenance personnel were informed of this observation.

I observed smoke emitting from the partially-open ceiling cover at the roof above the shot blasting area. I smelled an odor from the opening as well. Maintenance personnel informed me that someone forgot to close the ceiling cover and that led to smoke emitting from the building.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

- No records were available to review during the inspection. I was informed that Ms. Litscher would provide the records related to the Miscellaneous metal MACT regulations.

CLOSING CONFERENCE

Requested documents:

- Daily VOC records usage of exterior coating operations with their technical data sheets from January 1, 2012 through December 31, 2016

Concerns: I informed the facility that the scrubber stack height could be an issue and under certain meteorological conditions, the scrubber emissions can be low enough to be a concern in the nearby neighborhood. WDNR may need to run a new air model to consider the emissions characteristics from the scrubber stack.

SIGNATURES

Lead Inspector: _____ Date: 3/31/17

Section Chief: _____ Date: 4/4/17